

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Demetrius Baker,

Case No. _____

Plaintiff,

vs.

Custom Plastic Printers, Inc.,
Jeff Bloedel, Tania Pryor,
Luke Lingle, and Bill Hayes,

NOTICE OF REMOVAL

Defendants.

Defendants Custom Plastic Printers, Inc., Jeff Bloedel, Tania Pryor, Luke Lingle, and Bill Hayes (collectively “Defendants”), by and through its undersigned counsel, as and for its Notice of Removal of an action filed in the Fourth Judicial District Court, Hennepin County, Minnesota to the United States District Court, District of Minnesota, states:

REMOVAL IS TIMELY

1. On September 15, 2015, through service of a Summons and Complaint, Plaintiff Demetrius Baker commenced an action against Defendants in the Fourth Judicial District Court, Hennepin County, Minnesota. A true and correct copy of the Summons and Complaint is attached as Exhibit 1.

2. This Notice of Removal is therefore timely pursuant to 28 U.S.C. § 1446(b) because it is filed within thirty (30) days of the date that Defendants were served with the Summons and Complaint.

**REMOVAL IS PROPER BASED ON PLAINTIFF'S CLAIMS
OF VIOLATION OF TITLE VII**

3. This is a civil action in which this Court has original jurisdiction pursuant to 28 U.S.C. § 1331, and is removable to this Court pursuant to the provisions of 28 U.S.C. § 1441. Plaintiff alleges a violation of Title VII of the Civil Rights Act of 1991, 42 U.S.C. § 2000e, *et seq.* (1964).

**DEFENDANTS HAVE COMPLIED WITH
THE REMOVAL PROCEDURES**

4. As required by 28 U.S.C. § 1446(a), Defendants have attached as Exhibit 1 to this Notice of Removal a copy of all process, pleadings and orders served upon it relating to the State Court action.

5. As required by 28 U.S.C. § 1446(d), a copy of this Notice of Removal will be served upon Plaintiff, by and through its counsel of record, and with the Clerk of the Fourth Judicial District Court, Hennepin County, Minnesota, the State Court under which Plaintiff initially commenced an action against Defendants.

6. As required by 28 U.S.C. § 1446(b), all Defendants who have been properly served consent to the removal of the action.

DEFENDANTS PRESERVE ALL DEFENSES

7. Defendants' Answer or other response to the Complaint was not due prior to filing this Notice of Removal. By filing this Notice of Removal, Defendants do not waive any defense or counterclaim that may be available to them, including jurisdictional defenses. As required under Fed. R. Civ. P.

81(c)(2), Defendants will respond to the Complaint within the time set forth therein, unless an extension of the deadline is properly obtained pursuant this Court's approval.

WHEREFORE, Defendants respectfully remove the above-referenced cause of action from the Fourth Judicial District Court, Hennepin County, Minnesota to the United States District Court of Minnesota, submit that no further proceedings be had in Minnesota State Court, and request such other and further relief as is necessary and proper.

Dated: October 5, 2015

s/Angela Beranek Brandt
Angela Beranek Brandt (#0293143)
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